

**IN THE UNITED STATE DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

**CARL E. DOTSON**

**PLAINTIFF**

**V.**

**Case No. 4:18-CV-00935 DPM**

**CALEB MONROE**

**DEFENDANT**

**MOTION FOR SUMMARY JUDGMENT**

**COMES NOW**, Defendant, Caleb Monroe, in his individual and official capacities as a Police Officer for the Little Rock Police Department, by and through undersigned counsel, Thomas M. Carpenter, City Attorney and Laurantaneous J. Jarrett, Assistant City Attorney, and for his Motion for Summary Judgment, states:

1. On December 19, 2018, Plaintiff filed suit under 42 U.S.C. § 1983 against Caleb Monroe, (“Monroe”), Police Officer for the Little Rock Police Department (“LRPD”), in his official and individual capacities.

2. Monroe was served with the Complaint and Summons on February 6, 2019, pursuant to this Court’s Order of January 23, 2019 [Doc. #7].

3. Defendant hereby move this Court for an Order directing entry of Summary Judgment pursuant to F.R.Civ.P 56(c) in favor of the Defendant and against the Plaintiff on the causes of action alleged in Plaintiff’s Complaint [Doc. #2] and Addendum to Complaint [Doc. #3].

4. This motion is made on the grounds that there is no genuine issue as to any material fact and that Defendant is entitled to judgment as a matter of law.

5. The undisputed material facts in this case demonstrate that Plaintiff is unable to meet his burden of proof as to any of the allegations against Defendant, and Defendant is therefore

entitled to judgment as a matter of law pursuant to Fed. R. Civ. P. 56. Officer Monroe is further entitled to summary judgment on the basis of qualified immunity

6. In support of his Motion, Defendant rely on the Statement of Undisputed Material Facts that has been filed contemporaneously herewith and the following exhibits that are attached to this motion:

Exhibit “A” Affidavit of Caleb Monroe

Exhibit “B” Plaintiff’s Complaint [Doc. 2]

Exhibit “C” Plaintiff’s addendum to Complaint – Affidavit of Arrest [Doc. 3]

Exhibit “D” Deposition Excerpts – Carl Dotson

Exhibit “E” Mobile Vehicle Recorder (“MVR”) from Defendant’s patrol vehicle

Exhibit “F” Little Rock Police Department Photographic Line-up admonition form

Exhibit “G” Forensic evaluation report excerpts – Arkansas Dept. of Human Services

Exhibit “H” Arkansas Circuit Criminal Sentencing Order

7. Defendant’s Brief in Support of Motion for Summary Judgment accompanies this Motion.

**WHEREFORE**, Defendant, Caleb Monroe, respectfully prays that the Court grant his Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56 and dismiss the Complaint with prejudice; all other relief to which he may be entitled.

Laurtaneous J. Jarrett #2016060  
Assistant City Attorney  
500 West Markham Street, Suite 310  
Little Rock, Arkansas 72201  
Tel: (501) 371-4527  
Fax: (501) 371-4675  
ljohnsonjarrett@littlerock.gov

**CERTIFICATE OF SERVICE**

I hereby certify that on December 4, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and that a true and correct copy of the foregoing has been served upon Carl Dotson ADC #122778, *Pro Se*, East Arkansas Unit, Arkansas Department of Correction, P. O. Box 970, Marianna, AR 72360 by placing the same in the United States Mail, with sufficient postage prepaid.

Laurtaneous J. Jarrett